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May 16, 2021

Via ECF

Hon. Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Avraham Tarshish*, 19-cr-408 (MKB)

Dear Judge Brodie:

We write to request a modification of Mr. Tarshish curfew to allow him to stay out until midnight on May 16 and May 17—the two nights of the Jewish holiday of Shavuot (Jewish Pentecost). As the holiday occurs in the summer when nightfall is late, the celebrations and meals often occur late in the night.

I have spoken to Mr. Tarshish's pre-trial officer who takes no position on this request. I emailed the assigned AUSA this afternoon but have (understandably) not yet heard back.

We apologize profusely for the lateness of this request.

Respectfully submitted,

/s/

Gedalia M. Stern